

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
FORMAN HOLT 365 West Passaic Street, Suite 400 Rochelle Park, NJ 07662 (201) 845-1000 Attorneys for Charles M. Forman, Chapter 7 Trustee Erin J. Kennedy, Esq. ekennedy@formanlaw.com	
In Re:	Chapter: 7 Joint Administration
MARINE ENVIRONMENTAL REMEDIATION GROUP LLC, et al., Debtors.	Case No.: 19-18994 (VFP) Judge: Hon. Vincent F. Papalia
MARINE ENVIRONMENTAL REMEDIATION GROUP LLC, et al., Plaintiffs, v. STARR INDEMNITY & LIABILITY COMPANY, et al., Defendants.	Adv. Pro. No. 20-1141 (VFP)

NOTICE OF MOTION TO APPROVE SETTLEMENT

PLEASE TAKE NOTICE that on the date and time set forth on the attached Order Shortening Time, Charles M. Forman, the chapter 7 trustee ("Trustee") for the estates of Marine Environmental Remediation Group LLC and MER Group Puerto Rico, LLC, through his attorneys, Forman Holt, shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, 07102, for entry of an order pursuant to Rule 9019(a) of the Federal Rules of Bankruptcy Procedure approving the settlement agreement entered into between the Trustee and Starr Indemnity & Liability Company, and granting such other and further relief as to this court is just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Trustee's motion, the undersigned shall rely on the application and certification of Charles M. Forman, the Chapter 7 Trustee. The nature of the relief requested does not require that briefs be submitted as required pursuant to D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, 50 Walnut Street, Newark, P.O. Box 1352, New Jersey, 07102, and served upon Forman Holt, attorneys for the Trustee, Attn: Erin J. Kennedy, Esq., 365 West Passaic Street, Suite 400, Rochelle Park, NJ 07662, no later than seven days prior to the return date of the within motion.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to the Amended General Order Regarding Court Operations Under the Exigent Circumstances Created by Coronavirus (COVID-19), this matter will be heard on the papers unless oral argument is requested or directed by the court, and any oral argument will be conducted remotely.

FORMAN HOLT
Attorneys for Trustee

Dated: November 23, 2020

By: /s/Erin J. Kennedy
Erin J. Kennedy